

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

MARC VEASEY, JANE HAMILTON, SERGIO )  
 DELEON, FLOYD J. CARRIER, ANNA BURNS, )  
 MICHAEL MONTEZ, PENNY POPE, OSCAR )  
 ORTIZ, KOBY OZIAS, JOHN MELLOR- )  
 CRUMLEY, PEGGY HERMAN, EVELYN )  
 BRICKNER, GORDON BENJAMIN, KEN )  
 GANDY, LEAGUE OF UNITED LATIN )  
 AMERICAN CITIZENS (LULAC), AND DALLAS )  
 COUNTY, TEXAS, )

*Plaintiffs,*

V.

RICK PERRY, Governor of Texas; and JOHN STEEN, Texas Secretary of State,

*Defendants.*

UNITED STATES OF AMERICA,

*Plaintiffs,*

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, IMANI CLARK, AURICA  
WASHINGTON, CRYSTAL OWENS, AND  
MICHELLE BESSIAKE.

*Plaintiff-Intervenors,*

TEXAS ASSOCIATION OF HISPANIC COUNTY  
JUDGES AND COUNTY COMMISSIONERS,  
HIDALGO COUNTY, AND MARIA LONGORIA  
BENAVIDES,

*Plaintiff-Intervenors,*

V.

STATE OF TEXAS, JOHN STEEN, in his official capacity as Texas Secretary of State; and STEVE McCRAW, in his official capacity as Director of the Texas Department of Public Safety,

*Defendants.*

TEXAS STATE CONFERENCE OF NAACP

CIVIL ACTION NO.

2:13-CV-193 (NGR)

[Lead case]

CIVIL ACTION NO.

2:13-CV-263 (NGR)

[Consolidated case]

BRANCHES; and the MEXICAN AMERICAN )  
 LEGISLATIVE CAUCUS OF THE TEXAS )  
 HOUSE OF REPRESENTATIVES, )

*Plaintiffs,* )

v. )

JOHN STEEN, in his official capacity as Secretary )  
 of State of Texas; and STEVE McCRAW, in his )  
 official capacity as Director of the Texas Department )  
 of Public Safety, )

*Defendants.* )

CIVIL ACTION NO.  
 2:13-CV-291 (NGR)  
 [Consolidated case]

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BELINDA ORTIZ, LENARD TAYLOR, )  
 EULALIO MENDEZ JR., LIONEL )  
 ESTRADA; ESTELA GARCIA ESPINOSA, )  
 ROXANNE HERNANDEZ, LYDIA LARA, )  
 MARGARITO MARTINEZ LARA, )  
 MAXIMINA MARTINEZ LARA, AND )  
 LA UNION DEL PUEBLO ENTERO, INC. )

*Plaintiffs,* )

v. )

STATE OF TEXAS; JOHN STEEN, in his )  
 Official capacity as Texas Secretary of State; )  
 And STEVE McCRAW, in his official capacity )  
 As Director of the Texas Department of )  
 Public Safety, )

*Defendants.* )

CIVIL ACTION NO.  
 2:13-CV-348 (NGR)  
 [Consolidated case]

**[PROPOSED] ORDER ON DEFENDANTS' MOTION TO COMPEL THE  
 PRODUCTION OF DOCUMENTS RESPONSIVE TO THE STATE OF TEXAS' FIRST  
 AND SECOND REQUESTS FOR PRODUCTION TO THE UNITED STATES**

Having considered Defendants' Motion to Compel the Production of Documents Responsive to the Defendants' First and Second Requests for Production to the United States, the Court finds that the Motion should be, and hereby is, GRANTED. The United States shall promptly produce the documents and electronically held information it has withheld on the basis

of the common interest doctrine and investigatory and law enforcement privilege. Additionally, given the deficiencies in the United States' amended privilege log, the United States shall promptly produce under protective order all documents for which it has not correctly asserted the attorney-client privilege, work product doctrine, or deliberative process privilege in accordance with the specificity requirements under Federal Rule of Civil Procedure 26(b)(5)(A)(ii) and the agreed terms of the Agreement Concerning Production Format, ECF No. 61-6.

**SO ORDERED.**

Date: \_\_\_\_\_, 2014.

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NELVA GONZALES RAMOS  
United States District Judge